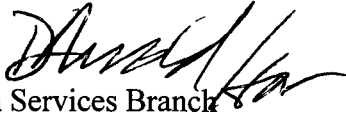



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

5/14/01

**SUBJECT:** Technical Support Document for the  
Redesignation of the Pittsburgh-Beaver Valley Ozone  
Nonattainment Area to Attainment and Approval of the  
Associated Maintenance Plan and Other Miscellaneous  
Revisions

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**TO:** File

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## **I. Background**

On April 9, 2001, the Commonwealth of Pennsylvania submitted a request to redesignate the Pittsburgh area to attainment of the ozone standard. The Commonwealth of Pennsylvania also, requested that the redesignation and maintenance plan be processed in parallel with the Commonwealth.

On November 15, 1990, the CAA amendments were enacted. Pursuant to section 107d)(4)(A), on November 6, 1991 [56 FR 56694], the Pennsylvania counties of Allegheny, Armstrong, Beaver, Butler, Fayette, Washington, and Westmoreland were designated as the Pittsburgh-Beaver Valley moderate ozone nonattainment area (the Pittsburgh area). On November 12, 1993, the Commonwealth of Pennsylvania formally submitted a redesignation request for the Pittsburgh ozone nonattainment area. At the same time, the Commonwealth submitted a maintenance plan for the Pittsburgh area as a SIP revision. The maintenance plan was subsequently amended on January 13, 1994 and again on May 12, 1995. During the 1995 ozone season, the Pittsburgh area violated the ozone NAAQS, making the area ineligible for redesignation. EPA disapproved the Commonwealth's redesignation request on May 1, 1996 [61 FR 19193], based on the 1995 ozone NAAQS violation.

On November 25, 1996 the Commonwealth certified that the Pittsburgh area monitored no exceedances during 1996 and formally requested an attainment date extension. EPA granted the

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Commonwealth an attainment date extension on February 25, 1997 [62 FR 8389]. Subsequently, the area violated the NAAQS again during the 1997 ozone season.

The Pittsburgh area has since recorded three years of complete quality-assured, ambient air quality monitoring data for the 1998 to 2000 ozone seasons, thereby demonstrating that the area has attained the 1-hour ozone NAAQS. EPA received a formal request to redesignate the Pittsburgh area on April 9, 2001 along with a proposed maintenance plan. The Commonwealth requested that EPA parallel process the prehearing redesignation submittal.

The Act provides the requirements for redesignating a nonattainment area to attainment. Specifically, section 107(d)(3)(E) allows for redesignation providing that: (1) The Administrator determines that the area has fully approved the applicable implementation plan for the area has attained the NAAQS; (2) The Administrator has fully approved the applicable implementation plan for the area under Section 110(k); (3) The Administrator determines that the improvement in air quality is due to permanent and enforceable reductions in emission resulting from implementation of the applicable Federal air pollutant control regulations and other permanent and enforceable reductions; (4) The Administrator has fully approved a maintenance plan for the area as meeting the requirements of section 175(A); and, (5) The State containing such area has met all requirements applicable to the area under section 110 and part D.

The EPA provided guidance on redesignation in the General Preamble for the Implementation of Title I of the Clean Air Act Amendments of 1990 on April 16, 1992 [57 FR 13498] and supplemented on April 28, 1992 [57 FR 18070]. The EPA has provided further guidance on processing redesignation requests in the following documents:

1. "Part D New Source Review (part D NSR) Requirements for Areas Requesting Redesignation to Attainment," Mary D. Nichols, Assistant Administrator for Air and Radiation, October 14, 1994, (Nichols, October 1994)
2. "Use of Actual Emissions in Maintenance Demonstrations for Ozone and Carbon Monoxide, (CO) Nonattainment Areas," D. Kent Berry, Acting Director, Air Quality Management Division, November 30, 1993.
3. "State Implementation Plan (SIP) Requirements for Areas Submitting Requests for Redesignation to Attainment of the Ozone and Carbon Monoxide (CO) National Ambient Air Quality Standards (NAAQS) on or after November 15, 1992," Michael H. Shapiro, Acting Assistant Administrator for Air and Radiation, September 17, 1993.
4. "State Implementation Plan (SIP) Action Submitted in Response to Clean Air Act Deadlines," John Calcagni, Director, Air Quality Management Division, October 28, 1992. (Calcagni, October 1992)
5. "Procedures for Processing Requests to Redesignate Areas to Attainment," John Calcagni, Director, Air Quality Management Division, September 4, 1992.
6. "Contingency Measures for Ozone and Carbon Monoxide (CO) Redesignations," G.T. Helms, Chief Ozone/Carbon Monoxide Programs Branch, June 1, 1992.
7. State Implementation Plans; General Preamble for the Implementation of Title I of the Clean Air Act Amendments of 1990 [57 FR 13498], April 16, 1992.

## **II. EPA analysis of the Commonwealth's Request**

### **1. The Area Must Be Attaining the 1-Hour Ozone NAAQS**

For ozone, an area may be considered attaining the 1-hour ozone NAAQS if there are no violations, as determined in accordance with 40 CFR 50.9 and appendix H, based on three complete consecutive calendar years of quality assured monitoring data. A violation of the 1-hour ozone NAAQS occurs when the annual average number of expected daily exceedances is equal to or greater than 1.05 per year at a monitoring site. A daily exceedance occurs when the maximum hourly ozone concentration during a given day is 0.125 parts per million (ppm) or higher. The data must be collected and quality-assured in accordance with 40 CFR part 58, and recorded in AIRS. The monitors should have remained at the same location the duration of the monitoring period required for demonstrating attainment.

The PADEP submitted ozone monitoring data for the April through October ozone season from 1998 to 2000. This data has been quality assured and is recorded in AIRS. During the 1998 to 2000 time period, the design value is 123 parts per billion. The average annual number of expected exceedances is 1.0 for that same time period.

### **2. The Area must have a Fully Approved SIP Under Section 110(k); and the Area Must Have Met All Applicable Requirements Under Section 110 and Part D**

*Section 110 Requirements.* General SIP elements are delineated in section 110(a)(2) of Title I, part A. These requirements include but are not limited to the following: submittal of a SIP that has been adopted by the state after reasonable notice and public hearing, provisions for establishment and operation of appropriate apparatus, methods, systems and procedures necessary to monitor ambient air quality, implementation of a permit program, provisions for part C, Prevention of Significant Deterioration (PSD), and Part D, New Source Review (NSR) permit programs, criteria for stationary source emission control measures, monitoring and reporting, provisions for modeling, and provisions for public and local agency participation. For the purposes of redesignation the Pennsylvania SIP was reviewed to ensure that all requirements under the amended CAA were satisfied through approved SIP provisions. EPA has concluded that the Commonwealth's SIP for the Pittsburgh area satisfies all of the Section 110 SIP requirements of the CAA.

In addition, the Commonwealth has adopted Phase I of the Section 145 NO<sub>x</sub> SIP call. EPA is currently preparing rulemaking action on the Commonwealth's NO<sub>x</sub> SIP call rule.

*Part D: General Provisions for Nonattainment Areas.* Before the Pittsburgh area may be redesignated to attainment, it must have fulfilled the applicable requirements of part D. Under part D, an area's classification determines the requirements to which it is subject. Subpart 1 of part D sets forth the basic nonattainment requirements applicable to all nonattainment areas. Subpart 2 of part D establishes additional requirements for nonattainment areas classified under Table 1 of section 181(a). As described in the General Preamble for the Implementation of Title 1, specific requirements of subpart 2 may override subpart 1's general provisions [57 FR 13501,

April 16, 1992]. The Pittsburgh area was classified as moderate ozone nonattainment. Therefore, in order to be redesignated, the Commonwealth must meet the applicable requirements of subpart 1 of part D- specifically section 172(c) and 176, as well as the applicable requirements of subpart 2 of part D.

*Section 172(c) Requirements.* EPA has determined that the redesignation request received from PADEP for the Pittsburgh area has satisfied all the relevant submittal requirements under section 172(c) necessary for the area to be redesignated. Earlier this year, on January 10, 2001 EPA proposed that the requirements of section 172(c)(1) and 182(b)(1) concerning submission of an ozone attainment demonstration and reasonably available control measures for reasonable further progress (RFP) or attainment will no longer be applicable to the area [66 FR 1925]. The RFP requirement under section 172(c)(2) is defined as progress that must be made toward attainment. Section 182(b)(1)(A) sets forth the specific requirements for RFP. On March 22, 1996, the Commonwealth submitted an RFP plan for the Pittsburgh area and on April 3, 2001 EPA approved the RFP plan as meeting the 15% RFP requirements of section 182(b)(1)(A). By meeting the specific 15% RFP requirement of section 182(b)(1)(A), the Pittsburgh area is also meeting the RFP requirement of section 172(c)(2). Section 172(c)(3) requires submission and approval of a comprehensive, accurate and current inventory of actual emissions. EPA published a direct final approval of the Commonwealth's actual VOC emissions inventory simultaneously with the 15% RFP plan on April 3, 2001 [66 FR 17634]. Today, EPA is proposing to approve the 1990 NOx actual emission inventory for the Pittsburgh area, as submitted on March 22, 1996, and supplemented on February 18, 1997. EPA has determined that the RFP and actual emission inventory requirement for the Pittsburgh area is satisfied.

Section 172(c)(5) requires permits for the construction and operation of new and modified major stationary sources anywhere in the nonattainment area. Section 182(b)(5) requires all major new sources or modifications in a moderate nonattainment area to achieve offsetting reductions of VOC's at a ratio of at least 1.15 to 1.0. The EPA granted limited approval of the Commonwealth's NSR program on December 9, 1997 [62 FR 64722]. EPA's sole reason for granting limited approval rather than full approval of Pennsylvania's regulations was that they do not contain certain restrictions on the use of emission reductions from the shutdown and curtailment of existing sources or units as NSR offsets. These restrictions only apply in nonattainment areas without an approved attainment demonstration [see 40 CFR Part 51.165(a)(ii)(C)]. The only portion of the Commonwealth where an attainment demonstration is still required, and has yet to be approved, is the Pennsylvania portion of the Philadelphia-Wilmington-Trenton severe ozone nonattainment area (consisting of Philadelphia, Delaware, Chester, Montgomery, and Bucks counties). Therefore, EPA is also proposing to convert its limited approval of Pennsylvania's NSR program to full approval for the entire Commonwealth, with the exception of the Pennsylvania portion of the Philadelphia-Wilmington-Trenton severe ozone nonattainment area where it shall, for the time being, retain its limited approval status.

*Section 176 Conformity Requirements.* Section 176(c) of the CAA requires states to establish criteria and procedures to ensure that Federally supported or funded projects conform to the air quality planning goals in the applicable SIP. The requirements to determine conformity applies

to transportation plans, programs and projects developed, funded or approved. under title 23 U.S.C. of the Federal Transit Act (“transportation conformity”), as well as to all other Federally supported or funded projects (“general conformity”). Section 176 further provides that state conformity revisions must be consistent with Federal conformity regulations that the CAA required the EPA to promulgate. The EPA believes it is reasonable to interpret the conformity requirements as not applying for purposes of evaluating the redesignation request under section 107(d). The rationale for this is based on a combination of two factors. First, the requirement to submit SIP revisions, to comply with the conformity provision of the CAA continues to apply to areas after redesignation to attainment, since such areas would be subject to a section 175A maintenance plan. Second, EPA’s Federal conformity rules require the performance of conformity analyses in the absence of Federally approved state rules. Therefore, because areas are subject to the conformity requirements regardless of whether they are redesignated to attainment and must implement conformity under Federal rules if state rules are not yet approved, the EPA believes it is reasonable to view these requirements as not applying for purposes of evaluating a redesignation request. Consequently, EPA may approve the ozone redesignation request for the Pittsburgh area without a fully approved conformity SIP. See Detroit, Michigan, carbon monoxide redesignation published on June 30, 1999 [64 FR 35017], Cleveland-Akron-Lorain ozone redesignation published on May 7, 1996 [61 FR 20458], and Tampa Florida, published on December 7, 1995 [60 FR 52748]. However, EPA did approve the Commonwealth’s general conformity SIP on September 29, 1997 [62 FR 50870].

By proposing approval of the maintenance plan for the Pittsburgh area, EPA is also proposing to approve the Motor Vehicle Emission Budgets (MVEB) contained in that plan adequate for maintenance of the ozone NAAQS. Upon the effective date of the final approval of the maintenance plan for the Pittsburgh area, the MVEB’s for both VOC and NOx contained in the plan shall be the applicable budgets that must be used for purposes of demonstrating transportation conformity. These budgets shall replace the VOC budget of the 15% plan and the so-called “NOx Build/No Build Test” currently being used to demonstrate transportation conformity in the Pittsburgh area.

Table IV-5, of PADEP’s proposal includes the following MVEBs, which is included as Table 1. of this TSD.

Table 1. Motor Vehicle Emissions Budgets

Pollutant	VOCs tons/day	NOx tons/day
1999	109.65	171.05
2007	98.22	129.12
2011	102	115.02

*Subpart 2 Section 182 Requirements.* The Pittsburgh area is classified as moderate ozone nonattainment; therefore part D, subpart 2 section 182(b) requirements apply. In accordance with

the September 17, 1993 EPA guidance memorandum, the requirements which came due prior to the submission of the request to redesignate the area must fully approved into the SIP before or at the time of the request to redesignate the area to attainment. Those requirements are discussed below:

*1990 Base Year Inventory.* The 1990 base year emission inventory was due on November 15, 1992. PADEP submitted the 1990 base year emission inventory on March 22, 1996 and later supplemented it on February 18, 1997. EPA published a direct final approval of the VOC base year inventory on April 3, 2001 [66 FR 17634].

The 1990 NOx inventory was submitted, along with the 1990 VOC inventory on March 22, 1996 and supplemented on February 18, 1997 for the Pittsburgh area. The Pittsburgh area NOx inventory was developed by the Commonwealth using the same methodology and protocol as the VOC inventory which EPA converted to full approval April 3, 2001.

*Periodic Emission Inventory.* Periodic inventories were required to be submitted on November 15, 1995 and November 15, 1998, providing an estimate of emissions for 1993 and 1996, respectively. This inventory is not considered a SIP requirement for the Pittsburgh area, therefore they do not need to be approved into the SIP. Pennsylvania provided its most recent estimates of emissions for 1999 in this redesignation request and these emissions are summarized in tables provided in this proposed action.

*Emission Statements.* Pennsylvania formally submitted an emissions statement SIP on November 12, 1992 and EPA approved the plan on January 12, 1995 [60 FR 2881].

*15 percent Plan.* The 15 percent RFP requirement plan for VOC reductions was required to be submitted by November 15, 1993, and, therefore is applicable to the Pittsburgh-Beaver Valley moderate ozone nonattainment area. The Commonwealth submitted a 15 percent plan on March 22, 1996 and EPA granted a conditional approval of the plan on January 14, 1998 [63FR 2147]. PADEP revised its 15 percent plan SIP on July 22, 1998 in order to address the conditions of the January 14, 1998 conditional approval. EPA removed the conditional approval of the Commonwealth's 15 percent plan and converted to a full approval on April 3, 2001 [66 FR 17634].

*VOC and NOx RACT Requirements.* SIP revisions requiring RACT for three classes of VOC sources are required under section 182(b)(2). The categories are: (1) All sources covered by a Control Technique Guideline (CTG) document issued between November 15, 1990 and the date of attainment; (2) All sources covered by a CTG issued prior to November 15, 1990; (3) All other major non-CTG rules were due by November 15, 1992 and apply to the Pennsylvania submittal.

On February 4, 1994, PADEP submitted a revision to its SIP for the control of VOC and NOx emissions from major stationary sources not covered by a CTG. This submittal was amended with a revision on May 3, 1994 correcting and clarifying presumptive NOx RACT requirements.

The revision consisted of regulations that require sources that have the potential to emit 50 tons per year (tpy) or more of VOC and 100 tpy of NOx in the Pittsburgh area to comply with RACT requirements by May 31, 1995. The regulations contain specific provisions requiring major VOC and NOx sources to implement RACT by May 31, 1995. The regulations also contain technology-based or operational "presumptive RACT emission limitations" for certain major NOx sources. For other major NOx sources, and all major non-CTG VOC sources (not otherwise already subject to RACT under the Pennsylvania SIP), the regulations contain a "generic" RACT provision. A generic RACT regulation is one that does not define RACT for a source or source categories but instead allows for case-by-case determinations. The generic provisions of Pennsylvania's regulation allows for PADEP to make case-by case RACT determinations that are then to be submitted to EPA as revisions to the Pennsylvania SIP.

On March 23, 1998 EPA granted conditional limited approval to the Commonwealth's generic VOC and NOx RACT regulations [63 FR 13789]. In that action, EPA stated that the conditions of its approval would be satisfied once the Commonwealth either (1) certifies that it has submitted case-by-case RACT proposals for all sources subject to the RACT requirements currently known to PADEP; or (2) demonstrate that the emissions from any remaining subject sources represent a de minimis level of emissions as defined in the March 23, 1998 rulemaking. On April 22, 1999, the PADEP made the required submittal to EPA certifying that it had met the terms and conditions imposed by EPA in its March 23, 1998 conditional limited approval of its VOC and NOx RACT regulations by submitting 485 case-by-case VOC/NOx RACT determinations as SIP revisions and making the demonstration described as condition 2, above. EPA has determined that Pennsylvania's April 22, 1999 submittal satisfies the conditions imposed in its conditional limited approval published on March 23, 1998. On May 3, 2001 (66 FR 22123), EPA published a rulemaking action removing the conditional status of its approval of the Commonwealth's generic VOC and NOx RACT regulations on a statewide basis. The regulation currently retains its limited approval status. After EPA approves the case-by-case RACT determinations submitted by PADEP for sources located in Allegheny, Armstrong, Beaver, Butler, Fayette, Washington, and Westmoreland Counties, the limited approval of Pennsylvania's generic VOC and NOx RACT regulations shall be converted to a full approval for the Pittsburgh area. Final approval of the redesignation of the Pittsburgh area from nonattainment to attainment will occur once EPA has converted the limited approval of Pennsylvania's generic VOC and NOx RACT regulations to a full approval for that area.

*Stage II Vapor Recovery.* Section 182(b)(3) requires states to submit Stage II rules no later than November 15, 1992. The Pennsylvania Stage II rules were submitted as a SIP revision on March 4, 1992. The SIP was supplemented on October 16, 1995. EPA approved the Stage II program for the Commonwealth of Pennsylvania on December 13, 1995 [60 FR 63940].

*Vehicle Inspection and Maintenance (I/M).* Pennsylvania submitted its enhanced I/M SIP to EPA on March 22, 1996. EPA granted conditional interim approval of the Commonwealth's enhanced I/M SIP on January 28, 1997. EPA granted full approval of the Commonwealth's enhanced I/M program on June 17, 1999 [64 FR 32411].

Pennsylvania has satisfied the requirement that the area must have a fully approved SIP under section 110(k) and the area must have met all applicable requirements under section 110 and part D.

3. The Improvement in Air Quality Must Be Due to Permanent and Enforceable Reductions in Emissions.

The improvement in air quality must be due to permanent and enforceable reductions in emissions resulting from the SIP, Federal Measures, and other state adopted measures. The improvement in air quality in the Pittsburgh area is due to emissions reductions from reductions in point, stationary, area, and highway controls. Point source reductions are due to implementation of RACT and further NO<sub>x</sub> controls, National Emission Standards for Hazardous Air Pollutants (NESHAPS) which reduce VOCs, Prevention of Significant Deterioration (PSD), NSR, and Section 145(NO<sub>x</sub> SIP Call) for utility and industrial boilers. Stationary area sources controls were implemented for the following categories: Automobile refinish coatings, consumer products, architectural and industrial maintenance coatings, wood furniture coatings, aircraft surface coating, marine surface coating, metal furniture coating, municipal solid waste landfills, treatment storage and disposal facilities, and Stage II vapor recovery. Several programs were implemented to reduce highway vehicle emissions, such as the Federal Motor Vehicle Control Program (FMVCP), a summertime gasoline 7.8 psi volatility limit, I/M, National Low Emission Vehicle (NLEV) program, EPA's heavy-duty diesel engine standards (beginning 2004), and EPA's Tier 2/low sulfur gasoline program. Nonroad source programs include: EPA rules for large and small compression-ignition engines, small spark-ignition engines, and recreation spark-ignition marine engines. Therefore, EPA has determined that the Commonwealth has demonstrated that the improvement in air quality is based on permanent and enforceable reductions in emissions.

4. The Area Must Have a Fully Approved Maintenance Plan Meeting the Requirements of Section 175A.

Section 175A of the CAA sets for the elements of a maintenance plan for areas seeking redesignation from nonattainment to attainment. The maintenance plan is a SIP revision which provides for maintenance of the relevant NAAQS in the area for at least 10 years after redesignation. The EPA memorandum dated September 4, 1992 from John Calcagni, provides additional guidance on the required content of a maintenance plan. An ozone maintenance plan should address the following five areas: the attainment emissions inventory, maintenance demonstration, monitoring network, verification of continued attainment and a contingency plan. The attainment emissions inventory identifies the emissions level in the area which is sufficient to attain the 1-hour ozone NAAQS, and includes emissions during the time period which had no monitored violations. Maintenance is demonstrated by showing that future emissions will not exceed the level established by the attainment inventory. Provisions for continued operation of an appropriate air quality monitoring network are to be included in the maintenance plan. The state must show how it will track and verify the progress of the maintenance plan. Finally, the potential contingency measures ensure prompt correction of any violation of the ozone standard.

The PADEP included a 1999 emissions inventory as the attainment inventory. The maintenance



plan provides emissions estimates from 1990 to 2011 for VOCs and NOx. The emissions in the Pittsburgh area are projected to decrease from the 1999 levels. The results of the analysis shows that the Pittsburgh area is expected to maintain the air quality standard for at least 10 years into the future after redesignation. Table 2. provides the emission summary for VOCs and Table 3. NOx for the Pittsburgh area.

Table 2. VOC emissions summary 1990 to 2011, Pittsburgh-Beaver Valley Area  
tons per day

Major Source Category	1990 base	1999 attainment	2007 projected	2011 projected
Point sources	96	34	36	38
Stationary Area Sources	128	130	136	142
Highway Vehicles	150	110	98	102
Nonroad Engines/Vehicles	28	64	42	37
Total	<b>402</b>	<b>338</b>	<b>313</b>	<b>319</b>

Table 3. NOx emissions summary 1990 to 2011, Pittsburgh-Beaver Valley Area  
tons per day

Major Source Category	1990 base	1999 attainment	2007 projected	2011 projected
Point sources	555	282	199	199
Stationary Area Sources	18	10	10	10
Highway Vehicles	144	171	129	115
Nonroad Engines/Vehicles	54	75	67	60
Total	<b>771</b>	<b>538</b>	<b>405</b>	<b>384</b>

The Commonwealth has committed to continue the operation of the monitors in the area in accordance with 40 CFR part 58. The Commonwealth will also track maintenance by reviewing the air quality and emissions data during the maintenance period. The plan also included motor vehicle emission budgets to be used for transportation conformity purposes for the Pittsburgh area.

The contingency plan for the Pittsburgh area consists of attainment tracking and contingency measures to be implemented in the event that a violation of the ozone NAAQS occurs in the Pittsburgh area. Two measures of attainment tracking will be utilized in the Pittsburgh area: (1) Air quality monitoring using the existing ozone monitoring network, and (2) inventory updates

on a regular schedule. Stationary, mobile, and area source inventories will be updated a minimum of once every three years beginning in 2002. The inventories will be assessed by comparison with the 1999 maintenance inventory to ensure that the emissions do not exceed the attainment year inventory by more than 10 percent.

The Commonwealth will develop periodic emissions inventories (every 3 years) beginning in 2002 and will evaluate these inventories relative to the 1999 baseline to assess whether further controls are needed.

The contingency measures to be considered for implementation for the Pittsburgh area are four VOC model rules currently being considered as additional measures for the Philadelphia Ozone Nonattainment area. The rules are part of a recent Memorandum of Understanding (MOU) and resolutions signed on March 28, 2001 by the states participating in the Ozone Transport Commission (OTC). The VOC rules under consideration have the potential to reduce emissions from consumer products, portable fuel containers, architectural and industrial Maintenance coatings, and solvent cleaning operations.

The Commonwealth's submittal adequately address the five basic components which comprise a maintenance plan (attainment inventory, maintenance demonstration, monitoring network, verification of continued attainment, and a contingency plan) and therefore, satisfy the maintenance plan requirement.

The CAA section 175A(b) also requires the PADEP to submit a revision of the SIP eight years after the original redesignation request is approved to provide for maintenance of the NAAQS for an additional 10 years following the first-10 year period. The Commonwealth did not formally commit to submit this revision in the redesignation request, however, PADEP is still required to submit a revision to the SIP 8 years after this request is approved.

### **III. Recommendation**

The Pittsburgh area has met the criteria for redesignation from nonattainment to attainment, therefore I recommend that the Pittsburgh area be redesignated to attainment of the 1-hour ozone NAAQS. I also recommend approving the 1990 NOx Base year inventory for the Pittsburgh area.